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UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

Case No. **ABA 25-cv-1272**

G.S. Michael T. Moore, Pro Se Plaintiff,

v.

Mayor Brandon Scott, P.F. Wilcox, Robert Leonard, Defendants.

COMPLAINT

Date: April 18, 2025

**TO THE HONORABLE BRENDAN A. HURSON, UNITED STATES DISTRICT
JUDGE:**

I, G.S. Michael T. Moore, pro se plaintiff, bring this action against Defendants Mayor Brandon Scott, P.F. Wilcox (peace officer, White Marsh Precinct 9), and Robert Leonard (lawyer) for violations of my civil rights under 42 U.S.C. § 1983. Defendants conspired to target me with three attempts on my life: a 2021 house arrest violation incident, a January 2, 2022, MRDCC fire, and a stabbing to stop my tort claim (24C23005039). A separate stabbing tied to my federal case (24-cv-02210) and a defective warrant detention in April 2025 were retaliatory. In 2021, I turned myself in at White Marsh Precinct 9 for a house arrest violation, ruled invalid by a judge. Wilcox committed illegal fingerprinting with clear Scotch tape, tampering, attempted murder, an unlawful chokehold, and abuse of power. I confronted Wilcox, demanding he cover up or get a supervisor; his return without one, captured on body camera footage, proves attempted murder. Internal Affairs falsely exonerated Wilcox, contradicted by an email and reports. Leonard covered up these incidents via email omission, shown in a video of admitted guilt and emails. Body camera footage, facility camera footage, guilt video, reports, and emails (Exhibits A-E) prove Defendants' actions, corroborated by my tort case (24C23005039). I seek \$600

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million in punitive damages and other relief to punish the Defendants' misconduct and remedy my suffering.

I. JURISDICTION AND VENUE

- This Court has jurisdiction under 28 U.S.C. § 1331 for federal questions and 28 U.S.C. § 1343(a)(3) for civil rights claims under 42 U.S.C. § 1983, alleging violations of Plaintiff's Fourth, Fifth, and Fourteenth Amendment rights.
- Venue is proper under 28 U.S.C. § 1391(b), as the events occurred in Baltimore, Maryland.

II. PARTIES

- Plaintiff: G.S. Michael T. Moore, a resident of Baltimore, Maryland, pro se. Contact: m.mconsult4u@gmail.com, 718 Allendale St, Baltimore, MD 21229.
- Defendant Brandon Scott: Mayor of Baltimore, acting under color of state law, orchestrated the conspiracy.
- Defendant P.F. Wilcox: Peace officer at White Marsh Precinct 9, acting under color of state law, committed illegal fingerprinting, tampering, attempted murder, an unlawful chokehold, and abuse of power.
- Defendant Robert Leonard: Lawyer, acting in concert with state actors, covered up Wilcox's misconduct, the MRDCC fire, and stabbings via email omission.

III. FACTUAL ALLEGATIONS

- Defendants, led by Scott, conspired to orchestrate three attempts on Plaintiff's life, enabled by a \$50 million Safe Streets payment on October 20, 2021, which disrupted jail safety. The attempts were a 2021 house arrest violation incident, the January 2, 2022, MRDCC fire, and a stabbing to stop Plaintiff's tort claim (24C23005039). A separate stabbing tied to a federal case (24-cv-02210) and a defective warrant detention in April 2025 were retaliatory.
- In 2021, Plaintiff turned himself in at White Marsh Precinct 9 for a house arrest violation, ruled invalid by a judge. Wilcox committed:
 - Illegal fingerprinting by applying clear Scotch tape to specific fingers to falsify Plaintiff's prints, captured on body camera footage (Exhibit A, held by White Marsh Precinct 9).
 - Tampering with an investigation by altering evidence, shown in body camera footage and reports (Exhibits A, D).
 - Attempted murder by attacking Plaintiff with intent to kill; Plaintiff demanded Wilcox cover up or get a supervisor, and Wilcox's return without one proves intent, captured on body camera footage (Exhibit A).

- Unlawful chokehold by applying excessive force, captured on body camera footage (Exhibit A).
- Abuse of power by suppressing Plaintiff's complaints, evidenced by reports (Exhibit D).
Internal Affairs falsely exonerated Wilcox, contradicted by an email and reports (Exhibit D, email held by Internal Affairs).
- On January 2, 2022, Plaintiff was detained at MRDCC, where a fire was the second attempt, enabled by the Safe Streets payment. Facility camera footage (Exhibit B, held by MRDCC) shows fire events. A video of admitted guilt (Exhibit C, held by Defendants) records admission of fault for the fire.
- After filing tort claim 24C23005039, a stabbing targeted Plaintiff to stop the claim, orchestrated by Defendants.
- After filing federal case 24-cv-02210, a separate stabbing was retaliatory, linked to Defendants' conspiracy.
- Leonard, in concert with Scott and Wilcox, covered up Wilcox's misconduct, the MRDCC fire, and stabbings by omitting email communications, shown in a video of admitted guilt and emails (Exhibits C, E, emails held by Leonard).
- In tort case 24C23005039, Plaintiff sues for negligence related to the MRDCC fire. Defendants admitted fault (Exhibit C) but later claimed adequate staffing. On April 8, 2025, the state court compelled Plaintiff's interrogatory responses, denying his protective order. Defendants' response to Plaintiff's Motion to Reconsider (Exhibit F) avoids interrogatories Nos. 3, 6, and 7, confirming negligence and Safe Streets' role (Exhibit G).
- In April 2025, Plaintiff was detained on a defective warrant for gun possession after probation expired, retaliating for exposing the conspiracy, supported by a Baltimore Brew article (<https://baltimorebrew.com/2020/02/08/man-summoned-to-court-in-scott-punching-incident-says-he-wont-go/#comments>).
- The state court's compelled interrogatory responses risk self-incrimination, as this case involves criminal scrutiny (Exhibit F).

IV. CLAIMS FOR RELIEF

Count I: Civil Rights Violation (42 U.S.C. § 1983 – Conspiracy and Attempts on Life)

- Defendants, acting under color of state law or in concert, violated Plaintiff's Fourteenth Amendment due process rights by conspiring to orchestrate three attempts on his life: the 2021 house arrest violation incident, the January 2, 2022, MRDCC fire, and a stabbing to stop tort claim 24C23005039.
- Scott orchestrated the conspiracy via Safe Streets. Wilcox executed the first attempt, and Leonard covered all attempts via email omission. Body camera footage, facility camera footage, guilt video, reports, and emails (Exhibits A-E) prove their actions, corroborated by tort case evidence (Exhibits F-G).
- Plaintiff suffered physical and emotional harm.

Count II: Unlawful Seizure and Due Process Violation (42 U.S.C. § 1983 – Faulty Warrant)

- Defendants violated Plaintiff's Fourth and Fourteenth Amendment rights by detaining him on a defective warrant for gun possession in April 2025.
- This detention was retaliatory for exposing the conspiracy.
- Plaintiff suffered loss of liberty.

Count III: Civil Rights Violation (42 U.S.C. § 1983 – Wilcox's Misconduct)

- Wilcox violated Plaintiff's Fourth and Fourteenth Amendment rights through illegal fingerprinting with clear Scotch tape, tampering, attempted murder, unlawful chokehold, and abuse of power in 2021, captured on body camera footage and reports (Exhibits A, D).
- Internal Affairs' false exoneration and Wilcox's refusal to involve a supervisor, shown on body camera footage (Exhibit A), prove intent.

Count IV: Civil Rights Violation (42 U.S.C. § 1983 – Leonard's Cover-Up)

- Leonard, in concert with state actors, violated Plaintiff's Fourteenth Amendment rights by covering up Wilcox's misconduct, the MRDCC fire, and stabbings through email omission, shown in the guilt video and emails (Exhibits C, E).
- His actions prolonged the conspiracy.

V. RELIEF REQUESTED

Plaintiff requests the following relief to remedy the physical, emotional, and constitutional harms caused by Defendants' conspiracy, assaults, and retaliation:

a. Injunctive Relief:

- A permanent injunction prohibiting Defendants from further retaliatory actions, including unlawful detentions, attempts on Plaintiff's life, or cover-up efforts.
- An order compelling Defendants to produce body camera footage, facility camera footage, emails, and reports held by White Marsh Precinct 9, MRDCC, Internal Affairs, and Leonard.
- An order directing Baltimore County Police and MRDCC to cease harassment or surveillance of Plaintiff.

b. Compensatory Damages: Monetary damages in an amount to be determined at trial for:

- Physical injuries from the unlawful chokehold in 2021, the January 2, 2022, MRDCC fire, and stabbings tied to tort claim 24C23005039 and federal case 24-cv-02210.
- Emotional distress from fear for Plaintiff's life and trauma from repeated attempts.

- Reputational harm from false accusations and detention in April 2025.
- c. Punitive Damages: \$600 million to punish Defendants for their willful, malicious misconduct, including attempted murder, tampering, and cover-up via email omission, to deter future violations.
- d. Declaratory Relief:
 - A declaration that Defendants' actions—illegal fingerprinting, chokehold, MRDCC fire, stabbings, and faulty warrant—violated Plaintiff's Fourth, Fifth, and Fourteenth Amendment rights.
 - A declaration affirming Plaintiff's right to self-defense against Defendants' attacks, supported by the Baltimore Brew article.
- e. Expungement: An order expunging the April 2025 defective warrant and gun possession charge from Plaintiff's criminal history, as they were retaliatory.
- f. Costs and Fees: All allowable costs, including the \$405 filing fee and service or copying expenses.
- g. Other Equitable Relief: Public disclosure of Defendants' misconduct and reforms at White Marsh Precinct 9 and MRDCC to prevent future abuses.

VI. CERTIFICATION

I certify that the foregoing is true and correct to the best of my knowledge. I understand false statements may result in sanctions under Fed. R. Civ. P. 11.

Respectfully submitted,


/s/ G.S. Michael T. Moore

G.S. Michael T. Moore

Pro Se Plaintiff

m.mconsult4u@gmail.com (mailto:m.mconsult4u@gmail.com)

718 Allendale St, Baltimore, MD 21229

Date: April 18, 2025

Attachments:

- Exhibit A: Body camera footage showing Wilcox's fingerprinting with clear Scotch tape, chokehold, and refusal to involve a supervisor in 2021, held by White Marsh Precinct 9.
- Exhibit B: MRDCC facility camera footage showing fire events on January 2, 2022, held by MRDCC.
- Exhibit C: Video of admitted guilt recording admission of fault for the fire, stabbing, or cover-up, held by Defendants.
- Exhibit D: Reports and email documenting Wilcox's misconduct and contradicting Internal Affairs' false exoneration, held by Internal Affairs or Plaintiff.
- Exhibit E: Emails showing Leonard's omission of evidence.
- Exhibit F: Motion to Reconsider in tort case 24C23005039.
- Exhibit G: Tort case 24C23005039 filings, including interrogatories and defense response.
- Exhibit H: April 2025 warrant and probation records.

Certificate of Service:

I certify that on April 18, 2025, a copy of this complaint and attachments was served on all defendants via U.S. Mail to Defendants' counsel at their respective addresses or via CM/ECF.



/s/ G.S. Michael T. Moore